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February 4, 2011
(PBW Project No. 1352)

VIA FEDERAL EXPRESS

Mr. Gary Miller
Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Barbara Nann
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 6
Superfund Division (6RC-S)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

**RE: DRAFT BASELINE ECOLOGICAL RISK ASSESSMENT REPORT
GULFCO MARINE MAINTENANCE SUPERFUND SITE
FREEPORT, TEXAS**

Dear Mr. Miller and Ms. Nann:

Please find enclosed three (3) copies (Mr. Miller) and one copy (Ms. Nann) of the Draft Baseline Ecological Risk Assessment (BERA) Report for the Gulfco Marine Maintenance Superfund Site (the Site). This draft report was prepared by URS Corporation (URS) on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy), and The Dow Chemical Company (Dow). In accordance with Paragraph 52 of the amended Unilateral Administrative Order for the Site, effective January 31, 2008 (the amended UAO), I certify that I have been fully authorized by these Respondents to submit this report and to legally bind these Respondents thereto. Parker Drilling Company has recently begun participating in the Site work as well under an agreement it reached with the Respondents.

The conclusions presented in this Draft BERA Report reflect the preliminary conclusions in the Final Preliminary Site Characterization Report (PSCR) approved by the U.S. Environmental Protection Agency (EPA) on December 8, 2010 and discussions in the project meeting with EPA and Texas Commission on Environmental Quality (TCEQ) representatives on December 1, 2010.

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Paragraph 13 of the Statement of Work attached to the amended UAO requires an electronic copy of project deliverables be provided in WordPerfect® format. However, as requested by Mr. Miller for previous project deliverables, an electronic copy of the text of the enclosed draft report is provided in Microsoft Word® format and the other report components are provided in Adobe® format instead. A DVD with these electronic files is transmitted herewith to Mr. Miller.

Thank you for the opportunity to submit this draft report. Please provide comments at your convenience. Should you have any questions, please do not hesitate to contact me at any time.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

Enclosures

cc: Ms. Luda Voskov – TCEQ (2 copies)
Mr. Doug McReynolds – EA Engineering, Science and Technology
Mr. Ron Brinkley – US Fish and Wildlife Service
Mr. Don Pitts – Texas Parks and Wildlife Department
Mr. Andy Tirpak – Texas Parks and Wildlife Department
Mr. Tommy Mobley – Texas General Land Office
Mr. Larry Champagne - Texas Commission on Environmental Quality